



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

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March 21, 2005

Mr. David Heins, Chief  
Environmental Sustainment Division [AFZA-PW-E]  
Ft. Bragg, NC 28310

**SUBJECT: Draft Environmental Impact Statement (EIS) Army Determination of Training Level on the Overhills Tract, Fort Bragg, NC [Cumberland and Harnett Counties], NC; CEQ No. 20050062; ERP No. COE-E-11055-NC, (dated January 2005)**

Dear Mr. Heins:

Pursuant to its responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the subject document, an evaluation of the impacts [societal, technical, and environmental] attendant to upgrading the current intensity of the military training at the Overhills Tract [OT]. The proposed improvements [structural, procedural, and operational] will allow larger troop units [company up to brigade sized units] to conduct the entire spectrum of mobilization/deployment training. After implementation, the existing structural features/land area at OT will be incorporated into and significantly enhance the overall training capabilities of the entire Northern Training Area [NTA].

The Army developed a screening process to determine the best all-round mix of military training, recreational uses, and treatment of historic properties at the 10,500 acre OT parcel. On the basis of the assigned criteria which included input from two public scoping meetings together with collaboration of the various Business Centers at Fort Bragg, Alternative IV was selected. That is, the option which maximizes practicable training levels up to brigade sized units, maintains the status quo as regards recreation amenities, and discontinues the existing historic district designation of the original Rockefeller properties. The no-action option would continue the use of the facilities at OT in their present limited, company size configuration. This low-impact restriction [no field refueling, fire-initiating munitions, or off-road travel, etc.] was deemed ill-advised based on the type(s) of future operational missions that army units will prosecute.

The increase in training activity at OT will involve both active and reserve components of the army, other armed services, and allied nation forces. Operations will

occur year round as Fort Bragg is home to the most intensive/varied training among Department of Defense military reservations. While the current training rate is approximately 2.5 million personnel days/year, the exigencies of future world events may result in even greater requirements becoming necessary. The common elements of this upgrade will use already existing facilities at OT; however, the tempo/duration of the existing training scenarios there will significantly increase.

Overall, the major environmental consequences of this proposal [noise, recreation management, range safety, earth/water resources, and endangered species] are adequately examined in the document. The graphics used in the data presentation were excellent, especially the color overlays associated with impacted resources and alternatives' comparisons. Mitigation of some of the specific impacts will be accomplished via best management practices [erosion control features] and/or structuring the various training scenarios [limiting night training to the early evening]. The measures to lessen adverse impacts are detailed by resource/media category in Chapter 4.

While noise [from vehicle ingress/egress and on-site operations] will increase with implementation of the proposal, effects will largely be contained within the training area boundaries. It was concluded that noise directly resulting from the increased training at OT is not expected to be problematic. This judgement was reached after the focus group data [from local residents hosted by the Army] was tabulated and revealed that area residents do not rate noise as a major issue as regards military activities. However, aircraft operating from Pope Air Force Base and Simmons and Mackall Army Airfield will continue to generate noise which will exceed 65 DNL and may be perceived as a consequence of this enhanced training.

We suggest it would be prudent for Fort Bragg's Environmental Noise Management Program [ENMP] staff to continue its coordination with local county officials in educating development interests and other elements of the civilian public about the noise ramifications of military training. An area of special emphasis would be problems which result from encroachment by activities that are incompatible with military training activities. We understand that ENMP staff already provides information to local land use planners to guide nearby development. This coordination will be especially important as regards development occurring within the in-holdings which penetrate the southern quadrant of OT. Recent NEPA evaluations for similar Department of Defense [DOD] actions have cited how widespread this trend [improvident land uses around DOD installations] has become and the need for [long-term] proactive coordination among the involved parties. While no mitigative measures for noise are currently recommended for the proposed action, it would be prudent for the ENMP group to investigate possibilities now for future use as necessary.

Noise effects on avian and wildlife species are well documented in the DEIS by

literature review and research from on-site DOD studies. The general conclusion reached was that the incremental effects of the proposed training, while pervasive, were within acceptable limits. Monitoring [and other coordination] with state/federal wildlife resource agencies would be appropriate to verify this conclusion after the proposed training is implemented.

Unavoidable landscape impacts associated with this proposal are adequately examined. Vegetational effects are primarily the result of direct destruction [vehicle/foot off-road traffic] and hydrological modification(s) associated with soil compaction during increased training activities within the subject areas. Previous experience from similar training activities [brigade mechanized training at Camp Shelby, MS] suggests that unless concerted efforts are put in place and subsequently maintained, erosion/sedimentation will become a significant problem. On this basis we were pleased to note that these issues are already conceptually addressed in the Integrated Natural Resources and Training Management Documents for Fort Bragg.

Permanent party range personnel should continue to monitor training area conditions as regards fire status and modify training when circumstances warrant. Effects of fire on game- and non-game animals residing within these habitats could become more significant, notwithstanding that the screening impacts' matrix did not assess significant, long-term adverse consequences to any of the species assessed. While the conclusion of insignificant effects may prove correct, this should be subsequently verified by monitoring after the upgraded range becomes operational.

Indirect impacts related to necessary infrastructure [road construction, infrastructure improvements, etc.] will be mitigated via initial design and subsequent site rehabilitation [rotation of training areas]. The DEIS does not expect any significant impacts to endangered species [red-cockade woodpecker, Michaux's Sumac or rough-leaved loosestrife] from this training upgrade, but we agree with the need to maintain close and ongoing consultation with pertinent state and federal wildlife agencies to verify this conclusion. One of the most significant indirect effects of this action will be positive, i.e., the reduction of training impacts on the remaining elements of the NTA. Currently, these areas are experiencing a degree of traffic that will be unsustainable from an environmental perspective. Upgrading the training capability of the OT will allow an equilibration of these adverse consequences. Given the remaining shortfall [areal extent] of training areas at Fort Bragg, we anticipate that further efforts will be made to secure additional parcels in the vicinity. EPA is sensitive to the Army's needs for realistic training and the difficulties this presents. Hence, we were pleased to note that installation environmental staff intend to achieve functional replacement for the values lost from this training upgrade. Exactly how success in this regard will be measured and then maintained should be discussed in the final EIS.

On the basis of our analysis, a rating of LO was assigned to implementing the proposed action, i.e., **Lack of Significant Objections**. We appreciate the opportunity to review/evaluate this documentation. Should you have further questions, Dr. Gerald Miller ([404-562-9626](tel:404-562-9626)/[Miller.Gerald@epa.gov](mailto:Miller.Gerald@epa.gov)) will serve as initial point of contact.

Sincerely,

/s/

Heinz J. Mueller, Chief  
NEPA Program Office